

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

GARDEN CITY BOXING CLUB, INC.,
as Broadcast Licensee of the **May 3, 2003**
DeLaHoya/Campas, Program,

REQUEST FOR DEFAULT

Plaintiff,

Civil Action No. 05-CV-10705-RCL

-against-

JORGE MEJIA, Individually, and as officer, director, shareholder and/or principal of CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO, and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO;

Defendants.

TO: TONY ANASTAS, CLERK

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

Please enter default of the Defendant, JORGE MEJIA, Individually, and as officer, director, shareholder and/or principal of **CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO, and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO**, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise defend the above-captioned action as fully appears from the Court's file herein, and from the attached Affidavit of Wayne D. Lonstein, Esq.

Dated: September 6, 2005
Ellenville, New York

LONSTEIN LAW OFFICE, P.C.

By: /s/ Wayne D. Lonstein

Wayne D. Lonstein, Esq.
Bar Roll No. 629060
Attorney for Plaintiff
1 Terrace Hill, P.O. Box 351
Ellenville, NY 12428
Telephone: 845-647-8500
Facsimile: 845-647-6277
Our File No. 03-5MA-03G

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

GARDEN CITY BOXING CLUB, INC.,
as Broadcast Licensee of the **May 3, 2003**
DeLaHoya/Campas, Program,

AFFIDAVIT IN SUPPORT OF
REQUEST FOR DEFAULT

Plaintiff,

Civil Action No. 05-CV-10705-RCL

-against-

JORGE MEJIA, Individually, and as officer,
director, shareholder and/or principal of CLUB
CULTURAL LATINO AMERICANO, INC.
d/b/a CLUB CULTURAL LATINO
AMERICANO, and CLUB CULTURAL
LATINO AMERICANO, INC. d/b/a CLUB
CULTURAL LATINO AMERICANO;

Defendants.

STATE OF NEW YORK :

: SS.:

COUNTY OF ULMSTER :

WAYNE D. LONSTEIN, being duly sworn, deposes and says:

1. That I am the attorney for Plaintiff, Kingvision Pay Per View, Ltd., in the above referenced matter and I am admitted to practice in this Court. I am fully familiar with all the facts, circumstances and proceedings heretofore had herein.
2. This action was commenced pursuant to 47 U.S.C. §605 *et seq.* Copies of the

Summons and Complaint were served on Defendants, **JORGE MEJIA, Individually, and as officer, director, shareholder and/or principal of CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO, and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO**, as set forth in the proofs of service by Nicole Jost, which were filed with the Court on August 29, 2005, as ECF documents nos 4 and 5.

3. The time within which the Defendants may answer or otherwise move with respect to the Complaint herein has expired. Defendants

JORGE MEJIA, Individually,

and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO

have not answered or otherwise moved with respect to the Complaint, and the time for the Defendants to do so has not been extended.

4. Said Defendants are not infants or incompetents. Upon information and belief, the Defendants are not presently in the military service of the United States.

WHEREFORE, Plaintiff, Kingvision Pay Per View, Ltd., requests that the default of the Defendants

JORGE MEJIA,

and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO

be noted and that judgment be entered in favor of Plaintiff and against Defendants in the manner stated herein.

Dated: September 6, 2005

Ellenville, NY 12428

/s/ Wayne D. Lonstein
Wayne D. Lonstein
Bar Roll No. 629060

Sworn to before me this 6th
day of September, 2005

/s/ Martha E. Dymond

Martha E. Dymond

Notary Public State of New York
Registration No. 4874397
Residing in Ulster County
Commission expires November 17, 2002

CERTIFICATE OF SERVICE

The undersigned certifies that on the 6th day of September, 2005, your deponent served the following documents by regular mail:

Request for Entry of Default, Affidavit in Support of Request for Entry of Default, Notice of Entry of Default

on the following:

Jorge Mejia
46 Shattuck Street
Lawrence, MA 01841

Club Cultural Latino-Americano
81 Common Street
Lawrence, MA 01840

/s/ Wayne D. Lonstein
Wayne D. Lonstein

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

GARDEN CITY BOXING CLUB, INC.,
as Broadcast Licensee of the **May 3, 2003**
DeLaHoya/Campas, Program,

NOTICE OF ENTRY OF
DEFAULT

Plaintiff,
-against-

Civil Action No. 05-CV-10705-RCL

JORGE MEJIA, Individually, and as officer,
director, shareholder and/or principal of CLUB
CULTURAL LATINO AMERICANO, INC.
d/b/a CLUB CULTURAL LATINO
AMERICANO, and CLUB CULTURAL
LATINO AMERICANO, INC. d/b/a CLUB
CULTURAL LATINO AMERICANO;

Defendants.

I, TONY ANASTAS, Clerk of the United States District Court for the District of Massachusetts, Boston Division, do hereby certify that the docket entries in the above entitled action indicates that the Defendants, **JORGE MEJIA, Individually, and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO**, were served with a copy of the Summons and Complaint on August 2, 2005.

I further certify that the docket entries indicate that

JORGE MEJIA, Individually,
and CLUB CULTURAL LATINO AMERICANO, INC. d/b/a CLUB CULTURAL LATINO AMERICANO
has never submitted an Answer or otherwise pled in their defense of this action and their default is hereby noted.

Dated: Boston, Massachusetts
September ___, 2005

TONY ANASTAS, Clerk

By: _____
Deputy Clerk